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CAMPAIGN FINANCE DIVISION

☒ **WAIVER REQUEST**
☐ **RECONSIDERATION REQUEST**

DATE: 10/21/2020
DOCKET #:

FILER INFORMATION

Name: International Paper PAC
Election Date: 10/12/2019
Level of Office: PAC

REPORT INFORMATION

Name of Report: 30-P
Original Due Date: 9/12/2019
Date Filed: 1/30/2020
Activity Receipts: \$ 595,105.67
Expenditures: \$ 668,809.56
Funds at Close of Reporting Period: \$ 141,474.25

LATE FEE INFORMATION

Amount of Late Fee: \$3,000
Days Late: 140
Late Fee Order Received: 4/22/2020
Payment/Waiver Request Due Date: 5/12/2020
Waiver Request Received: 5/12/2020
Additional Information Requested:

- Medical
- Financial
- Other

COMMENTS: Their compliance specialist spoke to Ethics representative and informed her that of a Federal PAC that they wanted to contribute more than \$20,000 to state level candidates and if these checks would trigger reporting obligations and that the Ethics representative advised that they would not have file report because the PAC received less than 50% of its total receipts from residence in LA., and disbursed the checks. In January of 2020, the PAC received a letter that outlined registration guidelines for the upcoming year. This letter raised questions about the PAC's 2019 contributions had, in fact, triggered registration and reporting requirements. As a result, they called the Ethics to confirm the previous information given remained accurate. They spoke with different Ethics representative which informed them that as soon as the PAC spends more than \$20,000, reporting is required.

OTHER LATE FEE INFORMATION

Campaign Finance:

Other Outstanding Reports: No
Other Outstanding Late Fees: No
Prior Late Fees: No
Reassessed Late Fees: No

Disclosure Statements:

Other Outstanding Late Fees: No
Prior Late Fees: No



May 12, 2020

Louisiana Board of Ethics
PO Box 4368
Baton Rouge, LA 70821

To Whom It May Concern,

The International Paper PAC ("the PAC") submits this response to the April 13, 2020 letter received on May 7, 2020 in regards to the late filing fee assessment for the 30 Day Pre-Primary report reflecting activity for the period covering January 1, 2019 through September 2, 2019.

International Paper PAC is a Federal PAC that operates and complies with Federal Election Campaign Laws and Regulations and multiple state agencies.

Provided in this response is an outline of the procedure followed by the PAC when making contributions to federal and state level candidates and committees, as well as the events leading up to the untimely submission of the 30 Day Pre-Primary report to the Ethics Administration. International Paper PAC has hired a vendor not only to assist with all of its filings, but also to ensure compliance with federal and state contribution limits, as well as registration and reporting requirements. Thus, prior to any checks being written by the PAC, the PAC's compliance vendor is responsible for reviewing the federal and state level check requests to ensure contribution limits are maintained, research into registration and reporting requirements within a state, bans during legislative session, and any other compliance matters that need to be identified and addressed.

In August of 2019, the PAC requested several checks to be cut to Louisiana state level candidates. In accordance with the procedure outlined above, the compliance vendor has informed me that it contacted the Ethics Administration to review the states reporting requirements. Further, the compliance specialist assigned to International Paper PAC's account states that he spoke to a representative from the Ethics Administration and informed her that he was calling on behalf of a Federal PAC that was interested in contributing more than \$20,000 to state level candidates. The compliance specialist informed me that he specifically asked if these checks would trigger any reporting obligations for the PAC and that the representative from the Ethics Administration advised that the PAC would not have any reporting obligation because the PAC received less than 50% of its total receipts from individuals residing in Louisiana. Due to this conversation with the Ethics Administration, our vendor moved forward in disbursing the checks while at the same time notifying me that no registration or reporting was required under the circumstances.

Subsequently, in January of 2020, the PAC received a letter from the Ethics Administration that outlined registration guidelines for the upcoming year. A review of the letter raised questions about whether the PAC's 2019 contributions had, in fact, triggered registration and reporting requirements. As a result, our compliance vendor again called the Ethics Administration to confirm that the information they were

LOUISIANA BOARD OF ETHICS
MAY 19 2020 2:43

International Paper Political Action Committee (IP-PAC)
1101 Pennsylvania Ave, NW, Suite 200 | Washington, DC 20004

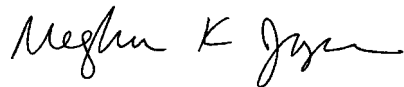
given in August of 2019 remained accurate. Our compliance representative has told us that at this point a different representative from the Ethics Administration informed the compliance vendor that the rule was such, that as soon as the PAC spends more than \$20,000, reporting is required. Immediately after this call, the compliance vendor prepared all necessary reports, registration documents and fees together to be disclosed to the state.

International Paper PAC believed it had protected itself by hiring a highly regarded vendor responsible for compliance. The untimely submission of the 30 Day Pre-Primary report was in no way knowing nor willful. The PAC took immediate action to disclose its activity to the state once the compliance vendor discovered that its previous understanding based on its August call with the Ethics Administration was incorrect.

Finally, International Paper is a Federal PAC that is registered and files monthly reports with the Federal Election Commission. All state level checks, including the contributions at issue here to Louisiana committees, were disclosed on its monthly federal reports. There was no intent in delaying the disclosure of these contributions. As such, we formally request the penalty and late notice receive a waiver from the Board of Ethics.

Please feel free to reach out if you have any additional questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Meghan K. Joyce". The signature is fluid and cursive, with the first name "Meghan" being the most prominent part.

Meaghan Killion Joyce
Treasurer

INTERNATIONAL  PAPER

Brenda Jones

1101 PENNSYLVANIA AVENUE NW

SUITE 200

WASHINGTON DC 20004-2511

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